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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JENNIFER SHARPE,

Plaintiff,

vs.

WERNER CO. also known as NEW
WERNER CO.; LOWE'S HOME
CENTERS, LLC, doing business as
LOWE'S HOME IMPROVEMENT
WAREHOUSE; LOWES COMPANIES
INC., and DOES 1 through 50,
inclusive,

Defendants.

NO. 2:23-cv-02239-DJC-DMC

**JOINT STIPULATION TO MODIFY
SCHEDULING ORDER AND ORDER**

Complaint Filed: August 8, 2023
Trial Date: September 29, 2025

Assigned to District Judge Daniel J.
Calabretta and Magistrate Judge Dennis
M. Cota

Pursuant to Civil Local Rule 143(a)(1) and subject to the Court's approval, the parties hereto jointly stipulate to modify the Scheduling Order filed November 20, 2023, (Document #13) as detailed below. This is the first request to modify the schedule.

This stipulation is being made because the parties wish to participate in mediation and want to avoid unnecessary costs that would be incurred prior to mediation if the scheduling order is not modified. The parties contemplate this will give mediation the greatest chance for success.

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Accordingly, in order to best manage costs and promote the efficient resolution of this matter, the parties propose the following amendments to the scheduling order.

The trial date is scheduled for September 29, 2025. We do not believe there will be any need to continue the trial if this stipulation is granted.

The parties stipulate and agree to the following amendments in the scheduling order:

Event	Current Deadline	New Proposed Deadline
Completion of Fact Discovery	October 15, 2024	December 15, 2024
Plaintiff's Initial Disclosure of Experts (and produce reports)	October 22, 2024	December 22, 2024
Defendants' Initial Disclosure of Experts (and produce reports)	November 12, 2024	January 12, 2025
Supplemental Disclosure of Experts	20 days after designation	No change
Plaintiff's expert testimony (rebuttal)	November 25, 2024	January 25, 2025
Defendants' expert testimony (rebuttal)	December 13, 2024	February 13, 2025
Expert Discovery Completion	January 17, 2025	March 17, 2025
Dispositive Motions (filing due on or before)	March 28, 2025	April 18, 2025
Dispositive Motion hearing date	May 15, 2025 at 1:30 pm	May 29, 2025 @ 1:30 pm
Final Pre-Trial Conference	July 31, 2025 at 1:30 pm	No change anticipated
Jury Trial	September 29, 2025 at 9:00 am	No change anticipated

The parties agree that all other matters contained in the Scheduling Order (Docket 13) filed November 20, 2023, are incorporated herein.

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1 Dated: September 26, 2024

REINER & FRANKEL, LLP

2 By /s/Rick Lundblade

3 Russell Reiner

4 Rick Lundblade

Attorney for Plaintiff,

JENNIFER SHARPE

5 Dated: September 26, 2024

CUNNINGHAM SWAIM, LLP

6 By /s/Jonathan E. Hembree

7 Michael J. Tehhar

8 Jonathan E. Hembree

Attorney for Defendants,

9 WERNER CO. (erroneously sued as

10 "WERNER CO. also known as NEW

WERNER CO.")

11
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13
14 Dated: September 27, 2024

/s/ Daniel J. Calabretta

15 THE HONORABLE DANIEL J. CALABRETTA

16 UNITED STATES DISTRICT JUDGE